

**From:** [John J. McNally](#)  
**To:** [Montanez, Yeliann](#); [Floyd, Tanya](#)  
**Cc:** [Han Sunoco](#)  
**Subject:** FW: Montco Research Products Site - confirmation of legal representation/work status in response to EPA  
**Date:** Thursday, November 21, 2019 4:25:13 PM  
**Importance:** High

---

Ms. Montanez and Ms. Floyd - – I am replying in accordance with our conversation today concerning the status of efforts to address the Montco facility and perform the work concerning conditions and disposal of chemical materials and waste. As FDEP has been aware and as I expressed to EPA and FDEP yesterday and to both of you today, I have been representing Montco for years concerning environmental assessment and remediation activities at this site with the FDEP. I am also representing Mr. Sunoo concerning the site work required as a result of the fire incident and de-activation of the facility. Mr. Sunoo is included in this message to confirm.

I have been working with Mr. Sunoo to address the facility and secure the tanks and containers and to address identification and disposal of the materials and wastes. These efforts are in progress and we are presently addressing the specific items in accordance with the EPA site visit yesterday. Mr. Sunoo and a former Montco employee were at the facility today to clarify this information and I have been in contact with disposal contractors to perform this work as soon as possible. We are in the process of addressing the specified tanks and performing this work.

In response to your request, this will confirm my legal representation on behalf of Montco and Mr. Sunoo concerning performance of this work in response to both the FDEP and the EPA requirements. As I have requested previously, all correspondence and communication should be directed to me so we are clear on the status of work in response to both the FDEP and EPA.

As we also discussed, I am requested that EPA provide clarification of the work presently being required so we are clear as we are in the process of performing this work. I can provide EPA with identification of the containers and contents presently being addressed for disposal in accordance with our best understanding and communication with EPA.

Please let me know as I and Mr. Sunoo are available to connect on the phone to further discuss this information and ongoing work.

It is important that we clarify this work so we can perform the work as requested.

Mr. Sunoo can reply to confirm his approval of my representation concerning this situation.

Thank you.

John.

John J. McNally, P.E., Esq.

John J. McNally, P.A.

(305) 666-7936 – Office

(305) 720-7936 – Mobile

[john@mcnallylawpa.com](mailto:john@mcnallylawpa.com)

[www.mcnallylawpa.com](http://www.mcnallylawpa.com)

“Practical legal/technical environmental solutions”

---

**From:** Montanez, Yeliann [mailto:Montanez.Yeliann@epa.gov]

**Sent:** Thursday, November 21, 2019 12:14 PM

**To:** [john@mcnallylawpa.com](mailto:john@mcnallylawpa.com); Floyd, Tanya

**Subject:** Montco Research Products Site

**Importance:** High

Mr. McNally:

Pursuant to our conversation just now, my contact information is as follows:

U.S. Environmental Protection Agency, Region 4  
61 Forsyth Street, SW  
Atlanta, Georgia 30303  
404-562-9522

Tanya Floyd's contact information is as follows:

Tanya Floyd

Attorney

U.S. Environmental Protection Agency, Region 4  
61 Forsyth Street, S.W.  
Atlanta, Georgia 30303  
Phone: (404) 562-9813  
Email: [floyd.tanya@epa.gov](mailto:floyd.tanya@epa.gov)

As we discussed, if you are attorney of record for Han Sunoo and/or Montco Research Products, Inc., please immediately send written notification to me at the above e-mail address. Your cooperation is greatly appreciated.

Sincerely,

Yeliann

Yeliann Montanez

Attorney

CERCLA/Federal Facilities

U.S. Environmental Protection Agency, Region 4  
61 Forsyth Street, SW  
Atlanta, Georgia 30303  
404-562-9522